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Counsel and Proposed Counsel for the Debtor and Debtor in Possession

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

HIGHLAND CAPITAL MANAGEMENT, L.P.,¹

Debtor.

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§
§

Chapter 11

Case No. 19-34054-sgj11

DISCLOSURE DECLARATION OF ORDINARY COURSE PROFESSIONAL

STATE OF TEXAS

)

) ss:

COUNTY OF DALLAS

)

¹ The Debtor's last four digits of its taxpayer identification number are (6725). The headquarters and service address for the above-captioned Debtor is 300 Crescent Court, Suite 700, Dallas, TX 75201.

I, Shawn Raver, hereby declare, under penalty of perjury, as follows, pursuant to the provisions of 28 U.S.C. § 1746:

1. I am an independent tax consultant and work at the Debtor's corporate headquarters.

2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the District of Delaware dated November 26, 2019 [Docket No. 176], authorizing the above-captioned debtor and debtor in possession (the "Debtor") to retain certain professionals in the ordinary course of business during the pendency of the Debtor's chapter 11 case (the "Case").

3. I have represented and advised the Debtor as a tax consultant and provide advice to the Debtor's business on various tax issues and have done so since August 2, 2012.

4. The Debtor has requested, and I have agreed, to continue to provide services to the Debtor pursuant to section 327 of chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") with respect to such matters.

5. The Debtor has requested, and I propose to render, such services to the following entities: Highland Capital Management, L.P.

6. My current customary rates, subject to change from time to time, are \$55 per hour, with a pay rate of \$82.50 per hour for all hours worked in a week in excess of a standard 40 hour work week.

7. To the best of my knowledge, formed after due inquiry, I have no connection with the Debtor or currently represent any of its creditors, other parties-in-interest, the

Office of the United States Trustee or any person employed by the Office of the United States Trustee with respect to the matters upon which it is to be engaged, and I do not, by reason of any direct or indirect relationship to, connection with, or interest in the Debtor, hold or represent any interest adverse to the Debtor, its estate, or any class of creditors or equity interest holders.

8. In addition, although unascertainable at this time after due inquiry, due to the magnitude of the Debtor's potential universe of creditors and my clients, I may have in the past represented, currently represent, and may in the future represent entities that are claimants of the Debtor in matters entirely unrelated to the Debtor and its estate. I do not and will not represent any such entity in connection with this pending Case and do not have any relationship with any such entity, attorneys or accountants that would be adverse to the Debtor or its estate.

9. To the best of my knowledge, formed after due inquiry, I have no affiliation with the Debtor, the Debtor's affiliates, Mr. James Dondero, or Mr. Mark Okada.

10. My process of ascertaining what, if any, connection I may have with any interest adverse to the Debtor, its estate or any class of creditors or equity interest holders, consists of the following: I have reviewed my records and my past representations.

11. I am not currently owed any amounts on account of any prepetition services provided to the Debtor.

12. In light of the foregoing, I believe that I do not hold or represent any interest materially adverse to the Debtor, its estate, creditors, or equity interest holders, as identified to me, with respect to the matters in which I will be engaged.

13. Except as set forth herein, I have received no promises as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, and orders of this Court.

14. I further state that I have not shared, nor agreed to share any compensation received in connection with this case with another party or person, other than as permitted by section 504(b) of the Bankruptcy Code and Bankruptcy Rule 2016.

15. The foregoing constitutes my statement pursuant to sections 329 and 504 of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure 2014 and 2016(b).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



SHAWN RAVER